



ONLINE SAFETY POLICY

**Head Office
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Policy Overview:

The purpose of this policy is to safeguard and protect all members of ALP Schools online community by providing a framework to promote and maintain a safe, effective and responsive online safety culture. The policy is applicable to all members of ALP Schools. This includes staff, students and pupils, volunteers, parents/carers, visitors and community users who have access to and are users of ALP Schools digital technology systems, both internally and externally.

References:

- Department for Education (DfE) (2021) Keeping Children Safe in Education: statutory guidance for schools and colleges. London: DfE.
- Department for Education (DfE) (2019) Teaching online safety in school: guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects. London: DfE.
- Department for Education (DfE) (2018) Working together to safeguard children. London: DfE
- Department for Education (2014) Cyberbullying: Advice for headteachers and school staff. London: DfE.
- Children Act 1989
- Children Act 2004
- Communications Act 2003
- Computer Misuse Act 1990
- Criminal Justice and Courts Act 2015
- Data Protection Act 1998
- Data Protection Act 2018
- Education Act 2011
- Education and Inspections Act 2006
- Freedom of Information Act 2000
- Malicious Communications Act 1988
- Serious Crime Act 2015
- Voyeurism (Offences) Act 2019

This policy links with other policies and practices

Include all policies with relevance, for example:

- *Whistleblowing*
- *Anti-bullying Policy*
- *Acceptable Use Policy*
- *Behaviour Management Policy*
- *Child protection policy*
- *Code of conduct*
- *Complaints policy*
- *Data protection policy*
- *Curriculum policy*

Disclaimer

Every effort has been made to ensure that the information contained within this policy is up to date and accurate and reflective of the latest legislative and statutory guidance. If errors are brought to our attention, we will correct them as soon as is practicable.

1. Introduction
2. Online Safety School Statement
3. Policy Scope
4. Roles and Responsibilities
5. Education and Training
6. Cultivating a Safe Environment
7. Responding to Online Safety Concerns
8. Responding to Complaints
9. Monitoring and Compliance
10. Financial Risk Assessment
11. Consultation / Approval Process
12. Dissemination and Communication Process
13. Development of the Policy
14. Appendices

1. Introduction

Online safety in schools is of paramount importance. As the online world evolves, so do both the online harms and risks facing our children and the relevant legislation, both statutory and non-statutory, which directs and guides how schools should meet their online safety requirements.

School staff and governors (Executive Board Members) play a vital role in setting an example for the whole school and are central to implementing policy and process. It is imperative that a whole school community approach to online safety is adopted and that all stakeholders are aware of their responsibilities and duties in relation to keeping children safe online. This will support a robust online safety ethos and ensure that schools are providing the best online safety provision they possibly can.

This policy is applicable to all members of ALP Schools. This includes, staff, students and pupils, volunteers, parents/carers, visitors and community users who have access to and are users of the ALP Schools digital technology systems, both internally and externally within the home and community setting.

2. Online Safety School Statement

ALP Schools asserts that online safety is an essential element of safeguarding and duly acknowledges its statutory obligation to ensure that all learners and staff are protected from potential online harm.

ALP Schools believes that the internet and associated devices are an integral part of everyday life

ALP Schools affirms that all learners should be empowered to build resilience and to develop strategies to recognise and respond to online risks.

3. Policy Scope

Online safety is an omnipresent topic which requires recurrent regulatory review and places a stringent duty of care on us all. This policy supports ALP Schools in meeting statutory requirements as per the DfE guidance under KCSiE (2021), Working together to safeguard children (2018) and non-statutory guidance, Teaching online safety in schools (2019). Effective, timely and robust online safety is fundamental to protecting children and young people in education and it is a significant part of the safeguarding agenda.

High quality online safety provision requires constant vigilance and a readiness to act where abuse, exploitation or neglect is suspected. The landscape of safeguarding is constantly evolving, and educational establishments must endeavour to embrace and shape their key priorities in support of this. Education has a vital role to fulfil in protecting children and young people from forms of online abuse whilst demonstrating a concerted obligation to respond with haste and flexibility to concerns as they arise. Above all, all staff must foster dedication to ensuring that they listen to the voices of the vulnerable and act upon what is heard. Safeguarding is everyone's responsibility.

Defining online abuse: *"Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones"* (NSPCC, 2019).

Hidden harms – types of online abuse may include:

- Cyberbullying
- Emotional abuse
- Grooming
- Sexting
- Sexual abuse
- Sexual exploitation

The types, patterns and different circumstances of significant harm and abuse should be considered within the categories identified for children in the Children Act 1989 / 2004. These are:

- Neglect
- Sexual
- Physical
- Emotional

Technology can facilitate a world of learning and development in addition to help yield a range of opportunities. However, the stark reality is that it can also present a window to potential and actual harm and abuse. It can elicit and support an array of illegal abusive behaviours including, but not limited to:

- harassment
- stalking
- threatening behaviour
- creating or sharing child sexual abuse material
- inciting a child to sexual activity
- sexual exploitation
- grooming
- sexual communication with a child
- causing a child to view images or watch videos of a sexual act.

This policy should be read alongside the relevant policies relating to safeguarding of children and in addition to the associated statutory legislation and guidance as stipulated on page 1 of this policy.

4. Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of all stakeholders across the online community within ALP Schools.

4.1 Teachers and Staff

All members of school staff (teaching and non-teaching) have a responsibility to protect children online. This includes every member of staff who works at the school; headteacher, teachers, teachers, agency staff, work-experience staff, office staff, nurses, premises officers, cleaners, etc. All teachers and staff must always act in accordance with their own professional boundaries, upholding professional behaviour and conduct at all times.

All school staff need to:

- Be aware of and adhere to all policies in school which support online safety and safeguarding.
- Contribute to policy development and review.
- Support in the ownership and responsibility for the security of systems and the data accessed.
- Model good practice when using technology.
- Know the process for making referrals and reporting concerns.
- Know how to recognise, respond and report signs of online abuse and harm.
- Receive appropriate child protection training.
- Always act in the best interests of the child.
- Be responsible for their own continuing professional development in online safety.

4.2 Governors and Senior Leadership Team

A governor's role for online safety in a school should include, but is not limited to:

- Upholding online safety as a safeguarding issue which is embedded across the whole school culture.
- Ensuring that children are provided with a safe environment in which to learn and develop.
- Ensuring that the school has appropriate filters and monitoring systems in place.
- Ensuring the school has effective policies and training in place.
- Carrying out risk assessments on effectiveness of filtering systems.
- Auditing and evaluating online safety practice.
- Ensuring there are robust reporting channels.

4.3 Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (Deputy DSL)

With respect to online safety, it is the responsibility of the DSL to:

- Ensure children and young people are being appropriately taught about and know how to use the internet responsibly.
- Ensure teachers and parents are aware of measures to keep children safe online through relevant training provision.
- Take responsibility for all safeguarding matters, including online safety.
- Collaborate with the senior leadership team, the online safety lead and computing lead.
- Facilitate effective record keeping and the reporting and monitoring of all online safety concerns.
- Promote online safety and the adoption of a whole school approach.
- Maintain their own training and learning needs, ensuring they are up to date with all matters relating to online safety.

4.4 Children and Young People

With respect to online safety in your school, children need to:

- Know who the DSL is.
- Engage in age appropriate online safety education opportunities.

- Contribute to policy development and review.
- Read and adhere to online safety policies.
- Respect the feelings of others, both off and online.
- Take responsibility for keeping themselves and others safe online.
- Where and how to find help with any online incidents or concerns.
- How, when and where to report concerns and when to seek help from a trusted adult.

The UKCCIS 'Education for a Connected World' framework aims to equip children and young people for digital life. It covers:

- Self-image and identity
- Online relationships
- Online reputation
- Online bullying
- Managing online information
- Health, wellbeing and lifestyle
- Privacy and security
- Copyright and ownership

4.5 Parents and Carers

Parents and carers need to understand the risks that children face online to protect them from online dangers. Parents need to:

- Read and adhere to all relevant policies.
- Be responsible when taking photos/using technology at school events.
- Know who the school DSL is.
- Know how to report online issues.
- Support online safety approaches and education provision.
- Be a role model for safe and appropriate behaviour.
- Identify changes in children's behaviour that could indicate they are at risk of online harm or abuse.

5. Education and Training

Safeguarding activity across the United Kingdom (UK) continues to intensify in volume and intricacy with national influences relating to political uncertainty, a rise in poverty, an increase in the ageing population, sustained funding pressures and increased demand for child and adult services.

Furthermore, a commitment to ensuring the provision of an integrated and highly robust safeguarding service for all ages is essential. Effective online safety provision and promotion of the welfare of children and young people relies upon constructive relationships that are conducive to robust multi-agency partnership working. This can only be effective when all staff are knowledgeable, confident and equipped with the skills to deal with processes and procedures when concerns arise relating to online abuse or harm.

Online safety has a high emphasis on a competent well-established workforce, up to date policies and procedures, robust governance arrangements and collaborative practices. Types of online risk usually fall under one of three categories:

Contact: Contact from someone online who may wish to bully or abuse the child. This could also include online grooming, online harassment or activities of a commercial nature, including tracking and harvesting person information.

Content: Inappropriate material available to children online including: adverts, spam, sponsorship, personal info, violent or hateful content, pornographic or unwelcome sexual content, biased materials, racist materials, and misleading information or advice.

Conduct: The child may be the perpetrator of activities including: illegal downloading, hacking, gambling, financial scams, bullying or harassing another child. They might create and upload inappropriate material or provide misleading information or advice.

5.1 Learners

ALP Schools will promote safe and responsible internet use:

- Education regarding safe and responsible use and access of the internet.
- Include online safety in Personal, Social, Health and Economic (PSHE) education, Relationships and Sex Education (RSE) and Information Computer Technology studies.
- Reinforce online safety messages as a continuum.

ALP Schools will support learner's understanding based on age and ability:

- Acceptable use policy
- Informing all learners of monitoring and filtering in place.
- Implement peer education strategies.
- Provide continuous training and education as part of their transition across key stages.
- Use alternative, complementary support where needed.
- Seeking learner voice.

5.2 Vulnerable Learners

Vulnerable children who need our help the most are not only missing out on opportunities to flourish online but are often experiencing the very worst that the online world can be. Over 2 million children in England are living in families with complex needs. Many children are living in families with domestic abuse, parental substance abuse and mental health problems.

ALP Schools recognises that some learners are more vulnerable due to a range of factors. Those children may be:

- Receiving statutory care or support.
- Known to have experienced specific personal harm.
- With a disability, ill-health or developmental difficulties.
- In households or families with characteristics or locations that indicate higher potential likelihood of current and future harm.
- Vulnerable or of concern by virtue of their identity or nationality.
- At risk in relation to activity or institutions outside the home.
- Caring for others.

ALP Schools will ensure the effective and safe provision of tailored online safety education. ALP Schools will obtain input and advice from specialist staff as deemed necessary.

5.3 Staff

ALP Schools will:

- Ensure provision of robust policies and practices as part of induction and ongoing training provision.
- Provide up to date online safety training at least annually or more in line with legislative and statutory changes and/or online safety incidents arising.
- Ensure training will include recognition of risks and responding to concerns.
- Inform of monitoring and filtering processes.
- Make staff aware that their online conduct outside of work can impact upon their professional role and responsibilities.
- Advise of appropriate resources.
- Ensure that all staff are aware of procedures to follow in recognising, responding and reporting online safety concerns.

5.4 Parents and carers

ALP Schools *will*:

- Recognise and cultivate the essential role parents and carers have in fostering safer online safety practices in children and young people.
- Ensure provision of resources, support and advice.
- Ensure provision and adherence to online safety policies and other policies of relevance.
- Advise of how and when to raise concerns.
- Provide details of all relevant contacts (for example, the DSL).
- Promote online safety on our website

6. Cultivating a safe environment

“All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs” (DfE, 2019).

Children should be educated in an age-appropriate way around:

- ✓ How to evaluate what they see online
- ✓ How to recognise techniques for persuasion
- ✓ Their online behaviour
- ✓ How to identify online risks
- ✓ How and when to seek support

6.1 Evaluate: How to evaluate what they see online

This will enable all our young people to make judgments about what they see online and not automatically assume that what they see is true, valid or acceptable.

ALP Schools will help all our young people to consider questions including:

- Is this website/URL/email fake? How can I tell?
- What does this cookie do and what information am I sharing?
- Is this person who they say they are?
- Why does someone want me to see this?
- Why does someone want me to send this?
- Why would someone want me to believe this?

6.2 Recognise: How to recognise techniques used for persuasion

This will enable all our young people to recognise the techniques that are often used to persuade or manipulate others. A strong grasp of knowledge across many areas makes people less vulnerable to these techniques and better equipped to recognise and respond appropriately to strongly biased intent or malicious activity.

ALP Schools will help all our young people to recognise:

- Online content which tries to make people believe something false is true and/or mislead (misinformation and disinformation).
- Techniques that companies use to persuade people to buy something.
- Ways in which games and social media companies try to keep users online longer (persuasive/sticky design)
- Criminal activities such as grooming.

6.3 Online Behaviour

This will enable all our young people to understand what acceptable and unacceptable online behaviour looks like. ALP Schools will teach all our young people that the same standard of behaviour and honesty applies online and offline, including the importance of respect for others. ALP Schools will also teach all our young people to recognise unacceptable behaviour in others.

ALP Schools will help all our young people to recognise acceptable and unacceptable behaviour by:

- Looking at why people behave differently online. For example, how anonymity (you do not know me) and invisibility (you cannot see me) affect what people do.
- Looking at how online emotions can be intensified resulting in mob mentality.
- Teaching techniques (relevant on and offline) to defuse or calm arguments (for example, a disagreement with friends) and disengage from unwanted contact or content online; and
- Considering unacceptable online behaviours often passed off as so-called social norms or just banter. For example, negative language that can be used, and in some cases is often expected, as part of online gaming and the acceptance of misogynistic, homophobic and racist language that would never be tolerated offline.

6.4 Identify: How to identify online risks

This will enable all our young people to identify possible online risks and make informed decisions about how to act. This should not be about providing a list of what not to do online.

The focus should be to help all our young people assess a situation, think through the consequences of acting in different ways and decide on the best course of action.

ALP Schools will help all our young people to identify and manage risk by:

- Discussing the ways in which someone may put themselves at risk online.
- Discussing risks posed by another person's online behaviour.
- Discussing when risk taking can be positive and negative.
- Discussing "online reputation" and the positive and negative aspects of an online digital footprint. This could include longer-term considerations; i.e. how past online behaviours could impact on their future when applying for a place at university or a job for example.
- Discussing the risks vs the benefits of sharing information online and how to make a judgement about when and how to share and who to share with.
- Asking questions such as what might happen if I post something online? Who will see it? Who might they send it to?

6.5 How and when to seek support

This will enable all our young people to understand safe ways in which to seek support if they are concerned or upset by something they have seen online.

ALP Schools will help all our young people by:

- Helping them to identify who trusted adults are.
- Looking at the different ways to access support from the school, police, the National Crime Agency's Click CEOP reporting service for children and 3rd sector organisations, such as Childline and the Internet Watch Foundation. This should link to wider school policies and processes around reporting of safeguarding and child protection incidents and concerns to school staff (see Keeping Children Safe in Education).
- Helping them to understand that various platforms and apps will have ways in which inappropriate contact or content can be reported.

7. Responding to Online Safety Concerns

The safety of the child and young person is of paramount importance. Immediate action may be required to safeguard investigations and any other children and young people. Any concern that children and young people may be at risk of harm or abuse must immediately be reported. Reputational issues must be managed appropriately by discussion with the relevant communications team.

Online safety is recognised as part of the education settings safeguarding responsibilities – the DSL should take lead responsibility for online safety concerns which should be recorded and actioned. Children and young people will be enabled (at a level appropriate to their age and ability) to share online concerns. The child protection policy for ALP Schools includes procedures to follow regarding online safety concerns.

Remember:

- Child welfare is of principal concern – the best interests of children take precedence.
- If there is any immediate danger, contact the police on 999.

- Refer to all appropriate agencies as per ALP Schools local process.
- Always adhere to local safeguarding procedures and report to the DSL or DDSL via CPOMS.

8. Responding to Complaints

There are a number of sources from which a complaint or allegation might arise, including those from:

- A child or young person
- An adult
- A parent/carer
- A member of the public (including a friend or relative)
- A colleague

There may be up to three components in the consideration of an allegation:

- A police investigation of a possible criminal offence.
- Enquiries and assessment by children's social care or adult social care relating to whether a child, young person or adult at risk is in need of protection or services.
- Consideration by an employer of disciplinary action in respect of the individual (including suspension).

It is also the responsibility of the member of staff to inform their line manager if they are being investigated in relation to children, young people or adults at risk with respect to protection concerns outside of work. They should also report if their own children/stepchildren/children they are living with become subject to child protection matters or an adult related to them or living with them become subject to adult protection matters. The line manager must report this to the DSL and Head Teacher (if DSL is not the Head Teacher).

9. Monitoring and Compliance

ALP Schools Safeguarding governor completes an annual review of online safety, with detailed feedback and an action plan if necessary, which is checked to ensure progress is made.

10. Consultation / Approval Process

This policy has been developed in conjunction with the online safety representatives in our schools and approved by the schools Executive Board

11. Dissemination and Communication Process

The policy will be placed in each schools Policy File in the Admin Drive, on the school website and will be published through an induction and training update, policy update briefings for staff and notified to the Governors Board. Newsletters will be issued to all parents and carers, noting the updated policy.

12. Development of the Policy

This policy will be reviewed annually, or earlier in the light of any incidents or investigations, legislative changes or developments in best employment practice, to ensure its continuing relevance and effectiveness.

14. Appendices

1. Equality impact assessment tool
2. Financial Risk assessment
3. Checklist for review of key document
4. Process flow chart

APPENDIX 1 Equality Impact Assessment Tool

To be completed by the key document author and attached to the key document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	• Race	N	
	• Ethnic origins (including gypsies & travellers)	N	
	• Nationality	N	
	• Gender	N	
	• Culture	N	
	• Religion or belief	N	
	• Sexual orientation including lesbian, gay & bisexual people	N	
	• Age	N	
	• Disability – learning disabilities, physical disability, sensory impairment & mental health problems	N	
2.	Is there any evidence that some groups are affected differently?	N	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N	
4.	Is the impact of the policy/guidance likely to be negative?	N	
5.	If so, can the impact be avoided?	N	
6.	What alternatives are there to achieving the policy/guidance without the impact?	N	
7.	Can we reduce the impact by taking different action?	N	

APPENDIX 2 Financial Risk Assessment

To be completed by the key document author and attached to key document when submitted to the appropriate committee for consideration and approval.

	Title of document:	Yes/No
1 .	Does the implementation of this document require any additional capital resources?	N
2 .	Does the implementation of this document require additional revenue?	N
3 .	Does the implementation of this document require additional manpower?	N
4 .	Does the implementation of this document release any manpower costs through a change in practice?	N
5 .	Are there additional staff training costs associated with implementing this document which cannot be delivered through current training programmes or allocated training times for staff?	N

APPENDIX 3

Checklist for the Review and Approval of Key Document

To be completed by the key document author and attached to any document which guides practice when submitted to the appropriate committee for consideration and approval.


	Title of document being reviewed:	Yes/No/Unsure	Comments
1.	Title		
	Is the title clear and unambiguous?	Y	
	Is it clear whether the document is a guideline, policy, protocol or standard?	Y	
2.	Rationale		
	Are reasons for development of the document stated?	Y	
3.	Development Process		
	Is the method described in brief?	Y	
	Identify which people have been involved in the development including stakeholders/users.	See below	
	Name	Job Title	
	David Cowell	Managing Director	
	Kyle Spencer	Online Safety Lead - ALP Leicester	
	Gemma Goseden	Proprietor and safeguarding Governor	
	Various	Executive Board	
		Yes/No/Unsure	Comments
	Do you feel a reasonable attempt has been made to ensure relevant expertise has been used?	Y	
4.	Content		
	Is the objective of the document clear?	Y	
	Is the target population clear and unambiguous?	Y	
	Are the intended outcomes described?	Y	
	Are the statements clear and unambiguous?	Y	
5.	Evidence Base		
	Is the type of evidence to support the document identified explicitly?	Y	
	Are key references cited?	N	
	Are the references cited in full?	N	

	Title of document being reviewed:	Yes/No/Unsure	Comments
	Are supporting documents referenced?	N	
6.	Approval		
	Does the document identify which committee/group will approve it?	Y	
	If appropriate, have the joint Human Resources/staff side committee (or equivalent) approved the document?	Y	
7.	Dissemination and Implementation		
	Is there an outline/plan to identify how this will be done?	Y	
	Does the plan include the necessary training/support to ensure compliance?	Y	
8.	Document Control		
	Does the document identify where it will be held?	Y	
	Have archiving arrangements for superseded documents been addressed?	Y	
9.	Process to Monitor Compliance and Effectiveness		
	Are there measurable standards or KPIs to support the monitoring of compliance with and effectiveness of the document?	Y	
	Is there a plan to review or audit compliance with the document?	Y	
10.	Review Date:		
	Is the review date identified?	Y	
	Is the frequency of review identified? If so, is it acceptable?	Y	
11.	Overall Responsibility for the Document		
	Is it clear who will be responsible for co-ordinating the dissemination, implementation and review of the document?	Y	

Individual Approval (this section to be completed by managerial/professional lead)

If you are happy to approve this document, please sign and date it and forward to the chair of the committee/group where it will receive final approval.

Name	David Cowell	Date	22/3/2022
Signature	D.Cowell		
Committee Approval			

	Title of document being reviewed:	Yes/No/ Unsure	Comments
	If the committee is happy to approve this document, please sign and date it and forward copies to the person with responsibility for disseminating and implementing the document and the person who is responsible for maintaining the organisation's database of approved documents.		
Name	Gemma Gosden	Date	24/03/2022
Signature			

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